

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

Booz Allen Hamilton Holding
Corporation,

Plaintiff,

v.

Civil Action No. 1:19-cv-00869

Ramez Tannous Shehadi and Walid
Fayad,

Defendants.

DECLARATION OF RAMEZ TANNOUS SHEHADI

I, Ramez Tannous Shehadi, pursuant to 28 U.S.C. § 1746, state as follows:

1. I am over twenty-one (21) years of age and competent to testify to the matters stated in this declaration. This declaration is given voluntarily. I have not been promised any benefit, coerced, or threatened in any manner in exchange for the testimony in this declaration. The information in this declaration is true and correct based upon my personal knowledge.

2. I am aware that a lawsuit has been filed against me in the United States captioned *Booz Allen Hamilton Holding Corporation v. Ramez Tannous Shehadi and Walid Fayad*, Civil Action No. 2019-05446, which was originally filed in the Circuit Court of Fairfax County, State of Virginia, and was subsequently removed to the U.S. District Court for the Eastern District of Virginia, Civil Action No. 1:19-cv-00869 (hereinafter, the “Lawsuit”).

3. I am a citizen of Canada and Lebanon.

4. I reside in the United Arab Emirates (“UAE”).

5. I am not, and have never been, a citizen of the United States or a resident of the State of Virginia.

6. I have never owned or operated a business in Virginia.

7. From March 2015 to March 2018, I owned an investment property in Virginia. However, I never resided at the property. I visited the property only one time (shortly before purchasing the property). The property was sold in March 2018.

8. I have never been employed by Plaintiff Booz Allen Hamilton Holding Corporation (“Booz Allen”). Indeed, at no time did I negotiate with, perform services for, or otherwise communicate with Booz Allen in Virginia or elsewhere.

9. Instead, at all times relevant, I was employed by Booz Allen Hamilton, Inc. (“BAH”), which is not a party to the Lawsuit.

10. In late 2013, as I was considering a job offer from another competing company, Joe Logue and Mike Jones (who, upon information and belief, were both employees with BAH) recruited me to work for BAH. Specifically, Logue and Jones contacted me while I was living and working in the UAE. Logue and Jones made multiple visits to both the UAE and Lebanon to recruit and interview me and numerous other potential team members (who BAH sought to hire).

11. BAH and I negotiated the terms of my employment primarily over e-mail and the phone—although, as stated previously, BAH employees visited me in the UAE and Lebanon on at least four occasions.

12. In early 2014, I signed the offer letter from BAH while I was located in Lebanon.

13. Upon information and belief, throughout the entire recruitment process, I only visited Virginia on one or two occasions at the request of BAH.

14. During my employment with BAH, I worked exclusively in the Middle East North Africa (“MENA”) region. I did not perform any work in Virginia. On rare occasions, I visited BAH’s offices to attend the annual holiday gathering, senior partner retreats, or other meetings.

15. As stated in Plaintiff’s Complaint, during my employment with BAH, I had no

involvement with the U.S. Government or any U.S. commercial business. Further, I did not transact or conduct any business in Virginia. My work for BAH exclusively involved operations in the MENA region.

16. In December 2017, I filed a lawsuit against Booz Allen, BAH, and “Booz Allen Hamilton, Inc. – Abu Dhabi” in the UAE (“UAE Lawsuit”). On May 14, 2019, the Abu Dhabi Court of First Instance issued a judgment in the UAE Lawsuit.

17. During settlement negotiations in the UAE Lawsuit, Booz Allen and BAH were informed and aware that I was currently residing and working in the UAE.

18. I never received any copy of the summons or complaint in this Lawsuit at my current residence.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 5th day of July, 2019.

A handwritten signature in blue ink, appearing to read 'R. Shehadi', with a large, sweeping horizontal stroke above the name.

Ramez Tannous Shehadi

WSACTIVE LLP:10646197.1